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*Proposed Counsel to the Debtors and
Debtors in Possession*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

In re:)	
)	Chapter 11
)	
TOMMY'S FORT WORTH, LLC, <i>et al.</i> , ¹)	Case No. 24-90000-11
)	
Debtors.)	(Joint Administration Requested)
)	

NOTICE OF DESIGNATION AS COMPLEX CHAPTER 11 BANKRUPTCY CASE

On May 20, 2024, the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”) each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code. The undersigned proposed counsel for the Debtors believe that these chapter 11 cases qualify as complex chapter 11 cases pursuant to this Court’s *Procedures for Complex Cases in the Northern District of Texas* for the following reasons:

 X The total liability of the Debtors, along with the total liabilities of the Debtors’ non-filing affiliates, exceeds \$25 million;

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number, are: Tommy’s Fort Worth, LLC (3473); Tommy’s Holding Company, LLC (2662); Tommy’s Grand Rapids, LLC (9224); Tommy’s Castaic, LLC (7501); Tommy’s Lewisville, LLC (4750); High Country Watersports, LLC (6160); Walloon Lake Village Marina, LLC (0277); MKB Florida Holdings, LLC (5698); Tommy’s Detroit, LLC (5242); Tommy’s California Fresno, LLC (8597); Tommy’s Phoenix, LLC (3036); Tommy’s Las Vegas, LLC (7721); Tommy’s Chattanooga, LLC (0839); Tommy’s California Ventura, LLC (5149); Tommy’s Rancho Cordova, LLC (1070); Tommy’s Stockton, LLC (1338); and Tommy’s Knoxville, LLC (8052).

X There are more than 100 parties-in-interest in this case;
 Any claims or interests in the Debtors are publicly traded.
 Other

A copy of the proposed *Order Granting Complex Chapter 11 Bankruptcy Case*

Treatment is attached hereto as **Exhibit A.**

Dated: May 21, 2024
Dallas, Texas

GUTNICKI LLP

/s/ Liz Boydston
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-and-

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Proposed Counsel to the Debtors and Debtors in Possession

CERTIFICATE OF SERVICE

I certify that on May 21, 2024, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Northern District of Texas.

/s/ Alexandria Rahn

Exhibit A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

In re:

TOMMY'S FORT WORTH, LLC, *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 24-90000-11
)
) (Joint Administration Requested)
)

ORDER GRANTING COMPLEX CHAPTER 11 BANKRUPTCY CASE TREATMENT

The above-captioned chapter 11 cases (collectively, the “**Cases**”) were filed on May 20, 2024. A Notice of Designation as Complex Chapter 11 Case was filed on May 21, 2024. After

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number, are: Tommy’s Fort Worth, LLC (3473); Tommy’s Holding Company, LLC (2662); Tommy’s Grand Rapids, LLC (9224); Tommy’s Castaic, LLC (7501); Tommy’s Lewisville, LLC (4750); High Country Watersports, LLC (6160); Walloon Lake Village Marina, LLC (0277); MKB Florida Holdings, LLC (5698); Tommy’s Detroit, LLC (5242); Tommy’s California Fresno, LLC (8597); Tommy’s Phoenix, LLC (3036); Tommy’s Las Vegas, LLC (7721); Tommy’s Chattanooga, LLC (0839); Tommy’s California Ventura, LLC (5149); Tommy’s Rancho Cordova, LLC (1070); Tommy’s Stockton, LLC (1338); and Tommy’s Knoxville, LLC (8052).

review of the initial pleadings filed in these Cases, the Court finds and concludes that these Cases are complex chapter 11 cases. Accordingly, IT IS HEREBY ORDERED THAT:

1. The Procedures for Complex Cases in the Northern District of Texas (the **Complex Case Procedures**) and the Local Bankruptcy Rules of the United States Bankruptcy Court for the Northern District of Texas (the “**Local Rules**”) shall apply to and govern these chapter 11 cases. Compliance with the Complex Case Procedures is required for all hearings, notice, and objection procedures. The Complex Case Procedures can be found on the Court’s website at: <https://www.txnb.uscourts.gov/complex-case-procedures>. If a conflict exists between the Local Rules and the Complex Case Procedures, the Complex Case Procedures shall govern. The Debtors (or their agent) shall give notice of this Order to all parties in interest within seven (7) days of entry of the Order. If any party in interest objects to the provisions of this Order, that party may file an appropriate motion articulating the objection and the relief requested within fourteen (14) days after service of the Order. After hearing the objection and any responses, the Court may reconsider any part of this Order and may grant relief, if appropriate.

End of Order

Order submitted by:

GUTNICKI LLP

/s/ Liz Boydston

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